

EXHIBIT A

Huynh, Andrew

From: Watkins, Jonathan
Sent: Tuesday, May 27, 2025 6:33 PM
To: Peter Starr; Huynh, Andrew
Cc: Leigh Nathanson; Brian Donovan
Subject: RE: Leadenhall - reply sealing

Peter,

Thank you for following up with that list. As we understand it, you plan to quote, in your reply brief, portions of documents that the Court has ordered sealed. We do request provisional sealing of quotations that are excerpted from sealed documents. From there, we will, to the extent necessary, follow Judge Koeltl's Individual Practices with respect to ultimate sealing.

I can confirm that we agree that it is appropriate to file the Notice of Disposition of Collateral publicly.

Regards,

Jon

Jonathan M. Watkins

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From: Peter Starr <pstarr@kslaw.com>
Sent: Tuesday, May 27, 2025 12:46 PM
To: Watkins, Jonathan <Jonathan.Watkins@cwt.com>; Huynh, Andrew <Andrew.Huynh@cwt.com>
Cc: Leigh Nathanson <lnathanson@kslaw.com>; Brian Donovan <bdonovan@kslaw.com>
Subject: Leadenhall - reply sealing

[WARNING: External Email]

Jon and Andrew,

Following up on our call this morning, below is a list of specific citations on which we seek your input. Let us know if A-CAP requests provisional sealing with respect to these items. Please also let us know your position on the Nutmeg foreclosure notice you sent to us last night.

- ECF 282-1 at 2, 4-5, email correspondence between counsel and M. Shapiro – to support the propositions (1)

(2)

(3)

, and (4)

- ECF 282-8, Shapiro 30b6 deposition – to support the propositions that (1) [REDACTED], (2) [REDACTED], (3) [REDACTED], and (4) [REDACTED].
- 282-10, [REDACTED] – for the proposition that [REDACTED].
- 306-2 at 2, Oct. 2024 email correspondence between J. Watkins and L. Nathanson – to support the proposition that A-CAP conditioned providing information about the Everton transaction on an NDA that would have prevented Leadenhall from using that information in contempt proceedings.
- 282-25, Shapiro deposition transcript – for the proposition that [REDACTED].

Regards,
Peter

Peter Starr
Partner

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